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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 Thomas R. Keane & Susan D. Keane,

17 Plaintiffs,

18 v.

19 United State of America,

20 Defendant.

21 Case No. 3:13-cv-05712-MEJ

22 STIPULATION EXTENDING TIME TO  
23 ANSWER OR OTHERWISE RESPOND  
24 AND CONTINUING CASE  
MANAGEMENT CONFERENCE AND  
~~[PROPOSED]~~ ORDER (Corrects CMC Continued Date)  
AMENDED

16 IT IS HEREBY STIPULATED by and between Defendant the United States of America

17 ("United States") and Plaintiffs Thomas R. Keane and Susan D. Keane ("Plaintiffs"), by and

18 through undersigned counsel and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Civil Rule 6-2,

19 that good cause exists and the parties request that the Court continue both the date for the United

20 States to answer or otherwise respond to Plaintiffs' Complaint, and the Case Management

21 Conference currently scheduled for March 13, 2014, by approximately 30 days, and state as

22 follows in support:

23 Plaintiffs commenced the instant action on or about December 10, 2013. Upon learning

1 of the Complaint, the Department of Justice contacted the Internal Revenue Service's Office of  
2 Chief Counsel and requested the administrative file associated with this case. The Office of  
3 Chief Counsel has yet to provide a copy of the administrative file to the Department of Justice.  
4 Without the administrative file, counsel for the United States is unable to prepare an adequate  
5 response to the Complaint.

6 Accordingly, the parties hereby stipulate that the United States shall have until March 7,  
7 2014, to answer or otherwise respond to Plaintiffs' Complaint, and also that the Case  
8 Management Conference currently scheduled for March 13, 2014, be continued until April 12,  
9 2014 at 10:00 am. The requested extension is not being made for purposes of delay, but to allow  
10 for a review of the relevant administrative materials. No party has obtained any previous  
11 extensions in this matter.

12  
13 Respectfully submitted this 31st day of January, 2014,

14 MELINDA HAAG  
15 United States Attorney

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1 ~~[PROPOSED]~~ ORDER

2 Upon stipulation of the parties, and for good cause shown, it is hereby ORDERED that  
3 the United States of America shall have until March 7, 2014, to answer or otherwise respond to  
4 Plaintiffs' Complaint.

5 It is further ORDERED that the Case Management Conference currently scheduled for  
6 March 13, 2014 is continued until April 10, 2014 at 10:00 am.

7

8 SO ORDERED this 3rd day of February, 2014.

9   
10 THE HONORABLE MARIA-ELENA JAMES  
11 UNITED STATES MAGISTRATE JUDGE